

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SAMAD BROTHERS, INC.,

Plaintiff,

v.

BOKARA RUG CO. INC., JAN SOLEIMANI,  
and GABRIEL VAKNIN,

Defendants.

Case No.: 09-cv-5843 (JFK)(KNF)

**SECOND DECLARATION OF JURA C.  
ZIBAS IN SUPPORT OF MOTION IN  
LIMINE**

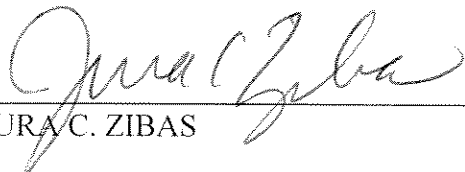
I, Jura C. Zibas, do declare and say:

1. I am an attorney at Wilson Elser Moskowitz Edelman & Dicker, LLP, counsel to defendants Bokara Rug Co. Inc., Jan Soleimani and Gabriel Vaknin (collectively "Bokara"). I make this declaration from personal knowledge and based on a review of the files of this case.

2. Attached hereto as **Exhibit 1** is a true and correct copy of e-mail correspondence between counsel to Bokara and counsel to Vikram Kapoor ("Kapoor"). In response to this correspondence, requesting an extension of time for Kapoor to submit proposed changes to his testimony, counsel to Bokara granted the request.

I hereby declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: April 7, 2011  
New York, New York

  
\_\_\_\_\_  
JURA C. ZIBAS

# **EXHIBIT 1**

**Smedresman, Scott**

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**From:** Zibas, Jura C.  
**Sent:** Wednesday, April 06, 2011 3:17 PM  
**To:** Smedresman, Scott  
**Subject:** FW: Bokara, et al. v. Kapoor, et ano.

Jura C. Zibas  
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**From:** S.KORENBAUM@comcast.net [mailto:S.KORENBAUM@comcast.net]  
**Sent:** Thursday, January 13, 2011 1:16 PM  
**To:** Zibas, Jura C.  
**Subject:** Bokara, et al. v. Kapoor, et ano.

Dear Jura:

Presently, Mr. Kapoor's time to return his deposition transcript is due on January 18, 2011. On Tuesday, January 11, 2011, Mr. Kapoor's father-in-law died (if you need proof of death I can provide you with Mr. Kapoor's e-mail to me about this). I respectfully request that Mr. Kapoor be given until Friday, January 21, 2011, to correct his deposition testimony.

Please let me know at your first opportunity whether you are willing to extend the time until January 21st.

Scott A. Korenbaum, Esq.  
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4/6/2011